

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
Case No.: 23-cv-23739-PCH**

JAMES WATSON,
Plaintiff,

vs.

MMPB GROUP, LLC, d/b/a/ Villar Azur
Defendant.

_____ /

DEFENDANT'S OFFER OF JUDGMENT

Defendant, MMPB Group LLC, a Florida corporation by and through undersigned counsel and pursuant to Federal Rules of Civil Procedure Rule 68 hereby makes the following offer to Plaintiff:

1. Defendant offers to allow judgment to be taken against, and in favor of the Plaintiff, for the following relief:
 - a. A declaration that Defendant's Website (and other online reservation platforms, as applicable) is owned, leased, operated, and/or controlled by Defendant in violation of the ADA;
 - b. An Order requiring Defendant, within 180 days of the judgment, to permanently implement policies, practices, procedures, including online content, consistent with the mandates of the 2010 ADAAG Standards on its Website (and other online reservation platforms, as applicable);
 - c. An award to Plaintiff of his reasonable attorney's fees, costs and litigation expenses;

- d. An award of compensatory damages deemed just and appropriate to Plaintiff; and
- e. Such other and further relief as the Court deems just and equitable.

Dated: October 17, 2023.

/s/ Lowell J. Kuvin
Lowell J. Kuvin, Esq.
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Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 17, 2023, I caused the foregoing to be sent via email to the recipient(s) listed in the Service List below.

/s/ Lowell J. Kuvin
Lowell J. Kuvin, Esq.

Service List

Courtney Cunningham,
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